

**Fill in this information to identify the case:**Debtor 1 LORA LEE NUNES AKA LORA NUNESDebtor 2  
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PennsylvaniaCase number 5:19-bk-01932-MJC

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**Name of Creditor: Nationstar Mortgage LLCCourt claim no. (if known):  
2Last 4 digits of any number you use to identify the debtor's account: 3819Property address: 25 Homestead Ln  
Number Street  
Lehighington, PA 18235  
City State ZIP Code**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 10/01/2024  
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

\_\_\_\_\_  
MM/DD/YYYY

Debtor1 LORA LEE NUNES AKA LORA NUNES  
First Middle Last

Case number (if known) 5:19-bk-01932-MJC

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**


**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

 /s/Mario Hanyon Date 07/05/2024  
Signature

Print Mario Hanyon Title Attorney  
First Name Middle Name Last Name

Company Brock & Scott, PLLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 3825 Forrestgate Dr.  
Number Street  
Winston-Salem, NC 27103  
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Wilkes-Barre Division*

IN RE:

LORA LEE NUNES AKA LORA NUNES

Case No. 5:19-bk-01932-MJC

Chapter 13

NATIONSTAR MORTGAGE LLC,  
Movant

vs.

LORA LEE NUNES AKA LORA NUNES ,  
Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Jason M Rapa, Debtor's Attorney  
141 South 1st Street  
Lehighton, PA 18235  
jrapa@rapalegal.com

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

US Trustee  
United States Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102

Via First Class Mail:

Lora Lee Nunes  
25 Homestead Lane  
Lehigh, PA 18235

Date: July 5, 2024

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com